## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE, EASTERN DIVISION

05 DEC -2 PM 2: 47

JACOB RHODES, et al.

Plaintiffs,

THOMAS M. GOULD CLERK, U.S. DISTRICT COURT W/D OF TN. MEMPHIS

vs.

No. 04-1191-T/P

SUSAN WALLACE, Individually, and HENDERSON COUNTY BOARD OF EDUCATION,

Defendants,

BRYAN MOONEY, et al.,

Plaintiffs,

VS.

No. 04-1190-T/P

SUSAN WALLACE, Individually, and HENDERSON COUNTY BOARD OF EDUCATION,

Defendants,

ZACHARY ROBBINS, et al.

Plaintiffs,

VS.

No. 04-1294-T/P

SUSAN WALLACE, Individually, and HENDERSON COUNTY BOARD OF EDUCATION,

Defendants,

PECENTIONS



DALTON DYER, et al.,

Plaintiffs,

vs.

No. 05-1004-T/P

SUSAN WALLACE, Individually, and HENDERSON COUNTY BOARD OF EDUCATION,

Defendants,

HALEY NICOLE RHODES, et al.,

Plaintiffs,

VS.

No. 05-1020-T/P

SUSAN WALLACE, Individually, and HENDERSON COUNTY BOARD OF EDUCATION,

Defendants.

## AGREED PROTECTIVE ORDER

It appearing to the Court, as evidenced by the signatures herein below of counsel for the respective parties to this cause, that the parties have agreed that the production of the following described records and documents should be subject to this Agreed Protective Order:

- 1. Any and all records relating to any minor, whether produced by Plaintiffs or Defendants;
- 2. The psychological/psychiatric records of any party;
- 3. The medical records of any party;

- TBI, DCS or other governmental investigation records relating to any minor or Susan
  Wallace; and
- 5. The academic records of any minor.

All records produced by any and all parties that are subject to this Protective Order shall be used for these cases only and for no other purpose. At the conclusion of this case, all such records shall be returned to the party that originally produced them, or shall be destroyed.

The introduction of these records at trial shall be subject to the Federal Rules of Evidence, and nothing in this Order shall restrict the use of the records at the trials of the above-styled cases.

This Agreed Protective Order may be amended by agreement or by Motion for good cause shown.

Entered this 2 day of December, 2005

JUDGE

APPROVED FOR ENTRY:

Respectfully submitted,

SPRAGINS, BARNETT, COBB & BUTLER, PLC

By:

BRANDON MCWHERTER #21600

EWIS L. COBB #5369 312 East Lafayette Street

P.O. Box 2004 Jackson, TN 38302 (731) 424-0461

Attorneys for Plaintiffs

by JBM with pernusan

RAINEY, KIZER, REVIERE & BELL

RUSTY REVIERE

DALE THOMAS 105 S. Highland Jackson, TN 38301

(731) 423-2414

and

LAW OFFICE OF BRENTWOOD LARRY L. CRAIN 5214 Maryland Way, Suite 402 Brentwood, TN 37027 (615) 376-2600

Attorneys for Defendant, Susan Wallace

WALDROP & HALL, P.A.

CHARLES M. PURCELL, #12461

JENNIFER K. CRAIG, #20036

106 S. Liberty Street Jackson, TN 38301 (731) 424-6211

Attorneys for Defendant, Henderson County Board of Education



## **Notice of Distribution**

This notice confirms a copy of the document docketed as number 60 in case 1:05-CV-01004 was distributed by fax, mail, or direct printing on December 7, 2005 to the parties listed.

Russell E. Reviere RAINEY KIZER REVIERE & BELL 209 E. Main Street Jackson, TN 38302--114

Charles M. Purcell WALDROP & HALL 106 S. Liberty Street P.O. Box 726 Jackson, TN 38302--072

R. Dale Thomas RAINEY KIZER BUTLER REVIERE & BELL 209 East Main Street Jackson, TN 38302--114

James Brandon McWherter SPRAGINS BARNETT COBB & BUTLER P.O. Box 2004 312 E. Lafayette Jackson, TN 38302--200

Clinton H. Scott SPRAGINS BARNETT COBB & BUTLER 312 East Lafayette St. Jackson, TN 38302--200

Jennifer Craig WALDROP & HALL 106 S. Liberty Street P.O. Box 726 Jackson, TN 38302--072

Honorable James Todd US DISTRICT COURT